

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

BRITISH TELECOMMUNICATIONS PLC)	
and BT AMERICAS, INC.,)	
)	
Plaintiffs,)	
)	C. A. No. 22-1538-CJB
V.)	
)	JURY TRIAL DEMANDED
PALO ALTO NETWORKS, INC.,)	
)	
Defendant.)	

**DECLARATION OF EDWARD WANG
IN OPPOSITION TO DEFENDANT’S MOTION TO TRANSFER VENUE**

I, Edward Wang, declare as follows:

1. I am an Associate at Proskauer Rose LLP and am counsel of record for British Telecommunications plc and BT Americas, Inc. (collectively, “BT”) in the above-captioned case.
2. Attached as **Exhibit 1** is a true and correct copy of a recorded assignment for U.S. Patent No. 7,159,237 at Reel 024964 Frame 0835, retrieved from the U.S. Patent and Trademark Office’s (USPTO) patent assignment database, assignment.uspto.gov, on March 9, 2023.
3. Attached as **Exhibit 2** is a true and correct copy of a recorded assignment for U.S. Patent No. 7,159,237 at Reel 023657 Frame 0530, retrieved from the U.S. Patent and Trademark Office’s (USPTO) patent assignment database, assignment.uspto.gov, on March 9, 2023.
4. Attached as **Exhibit 3** is a true and correct copy of a recorded assignment for U.S. Patent No. 7,159,237 at Reel 037632 Frame 0557, retrieved from the U.S. Patent and Trademark Office’s (USPTO) patent assignment database, assignment.uspto.gov, on March 9, 2023.

5. Attached as **Exhibit 4** is a true and correct copy of a recorded assignment for U.S. Patent No. 7,159,237 at Reel 037632 Frame 0605, retrieved from the U.S. Patent and Trademark Office's (USPTO) patent assignment database, assignment.uspto.gov, on March 9, 2023.
6. Attached as **Exhibit 5** is a true and correct copy of *Selective Signals, LLC v. Palo Alto Networks, Inc.*, No. 6:17-cv-65, at ¶ 5 (E.D. Tx. Sep. 22, 2017).
7. Attached as **Exhibit 6** is a true and correct copy of excerpts of Palo Alto Networks, Inc.'s ("PAN") Proxy Statement filed with the U.S. Securities and Exchange Commission ("SEC"), retrieved from the SEC's EDGAR system, available at <https://www.sec.gov/Archives/edgar/data/1327567/000120677422002637/panw4099631-def14a.htm>, on March 9, 2023.
8. Attached as **Exhibit 7** is a true and correct copy of excerpts of Exhibit 10.23 of PAN's Form 10-K filed with the SEC, retrieved from the SEC's EDGAR system, available at <https://www.sec.gov/Archives/edgar/data/1327567/000132756722000028/panwex1023q422deferredcomp.htm>, on March 9, 2023.
9. Attached as **Exhibit 8** is a true and correct copy of excerpts of Exhibit 4.5 of PAN's Form 10-K filed with the SEC, retrieved from the SEC's EDGAR system, available at <https://www.sec.gov/Archives/edgar/data/1327567/000132756722000028/panwex45q422.htm>, on March 9, 2023.
10. Attached as **Exhibit 9** is a true and correct copy of printout of a job posting website, retrieved from <https://palo-alto-networks.talentify.io/job/systems-engineer-healthcare-accounts-wilmington-delaware-palo-alto-networks-3117595>, on March 9, 2023.

11. Attached as **Exhibit 10A** is a true and correct copy of a screenshot of PAN's website, retrieved from <https://jobs.paloaltonetworks.com/en/jobs/?search=&country=United+States&remote=true&pagesize=20#results> on March 9, 2023.
12. Attached as **Exhibit 10B** is a true and correct copy of a screenshot of PAN's website, retrieved from <https://jobs.paloaltonetworks.com/en/jobs/?search=&country=United+States&pagesize=20#results> on March 9, 2023.
13. Attached as **Exhibit 11** is a true and correct copy of a screenshot of a job posting website, retrieved from <https://jobs.cw39.com/jobs/technical-solutions-specialist-palo-alto-networks-remote-delaware/768916011-2/> on February 7, 2023.
14. Attached as **Exhibit 12** is a true and correct copy of a screenshot of PAN's website, retrieved from <https://www.paloaltonetworks.com/services/cpsp-partners/americas> on March 9, 2023.
15. Attached as **Exhibit 13** is a true and correct copy of a screenshot of Sun Management's website, retrieved from <https://www.sunmanagement.net/solutions/palo-alto-networks-next-generation-security-platform/> on March 9, 2023.
16. Attached as **Exhibit 14** is a true and correct copy of a manual, retrieved from <https://www.sunmanagement.net/wp-content/uploads/2021/03/Lab12-FieldNotes-Slack-integration-with-Palo-Alto-Networks-v2.pdf> on March 9, 2023.
17. Attached as **Exhibit 15** is a true and correct copy of a screenshot of the University of Delaware's website, retrieved from <https://udeploy.udel.edu/software/palo-alto-globalprotect-vpn/> on March 9, 2023.

18. Attached as **Exhibit 16** is a true and correct copy of a screenshot of PAN's website, retrieved from <https://www.paloaltonetworks.com/products/regional-cloud-locations> on March 9, 2023.
19. Attached as **Exhibit 17** is a true and correct copy of a printout of a job posting website, retrieved from <https://paloaltonetworkscareers.dejobs.org/jobs/#1> on March 9, 2023.
20. Attached as **Exhibit 18** is a true and correct copy of a screenshot of PAN's website, retrieved from <https://www.paloaltonetworks.com/customers/customer-successes> on March 9, 2023.
21. Attached as **Exhibit 19** is a true and correct copy of a screenshot of PAN's website, retrieved from <https://www.paloaltonetworks.com/customers/> on March 9, 2023.
22. Attached as **Exhibit 20** is a true and correct copy of excerpts of Palo Alto Networks, Inc.'s Form 10-K filed with the SEC, retrieved from the SEC's EDGAR system, available at <https://www.sec.gov/Archives/edgar/data/1327567/000132756722000028/panw-20220731.htm>, on March 9, 2023.
23. Attached as **Exhibit 21** is a true and correct copy of initial disclosures served by BT in *BT plc and BT Americas v. Fortinet, Inc.*, No. CV 1:18-01018 (D. Del., filed July 10, 2018).

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 20 day of March, 2023 in Washington, DC.

/s/ Edward Wang
Edward Wang